

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition for Rulemaking to Amend and	)	RM-11791
Modernize Parts 25 and 101 of the	)	
Commission's Rules to Authorize and Facilitate	)	
the Deployment of Licensed Point-to-	)	
Multipoint Fixed Wireless Broadband Services	)	
in the 3700-4200 MHz Band	)	
	)	

**COMMENTS OF STARRY, INC.**

Starry, Inc. (Starry)<sup>1</sup> submits these comments urging the Federal Communications Commission (Commission) to initiate a rulemaking to make the 3.7-4.2 GHz band available for fixed point-to-multipoint services on a shared basis with incumbent Fixed Satellite Service (FSS) and Fixed Service operators.<sup>2</sup> Making this spectrum available for point-to-multipoint fixed services in the near term will facilitate deployment of new wireless broadband services in underserved communities across the country.

This band has long been available for shared access between point-to-point Fixed Service and FSS operations. The existing sharing structure can be substantially enhanced now by making the band available for point-to-multipoint wireless broadband while continuing to protect FSS and existing Fixed Service deployments. Point-to-multipoint deployments allow operators to

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<sup>1</sup> Starry, Inc., is a Boston- and New York-based technology company that is utilizing millimeter waves to re-imagine last-mile broadband access as an alternative to fixed wireline broadband. Starry is currently deploying its proprietary fixed 5G wireless technology in the Boston-area, with plans to expand to our presence to additional U.S. cities by the end of 2017.

<sup>2</sup>*Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Services in the 3700-4200 MHz band*, Petition for Rulemaking, RM-11791 (filed June 21, 2017) (Petition).

cover broader areas at lower cost, serving many end points from fewer central locations. Coupled with the substantial amount of spectrum – 500 megahertz – this can enable fixed broadband providers to offer robust, high-speed, consumer broadband.

As the Petitioners note, there are a significant number of households in the United States that lack access to broadband.<sup>3</sup> Wireless broadband provides an alternative path to connecting these communities at a substantially lower cost than traditional wireline networks.<sup>4</sup>

Wireless Internet Service Providers (WISPs) have long made due with unlicensed spectrum or shared spectrum. It is a community that is well-situated to expand service in unserved areas while working around other users in the band. The Petitioner’s proposed sharing mechanisms will allow WISPs and other operators to access this spectrum in the near term, and protect incumbent operators.

We appreciate that the Commission recently initiated a proceeding to take a holistic look at the entire C band and the options for making it available to support flexible use services, including wireless broadband.<sup>5</sup> We support efforts to find and make available additional spectrum. But, that process will likely take years to complete, especially if the Commission concludes that it will clear incumbents out of the band. By making this spectrum available now for point-to-multipoint operations, it can be used to the benefit of broadband consumers across the country.<sup>6</sup>

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<sup>3</sup> See *id.* at 2-3.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183, FCC 17-104, Notice of Inquiry (rel. Aug. 3, 2017) (*NOI*).

<sup>6</sup> The Commission should consider allowing point-to-multipoint operations during the pendency of its consideration of the full C band pursuant to the *NOI*. It could condition any authorization on an explicit acknowledgement that the rules and rights for the band may change in the future.

The Commission can facilitate near-term broadband deployment by enhancing the rules for the 3.7-4.2 GHz band to allow point-to-multipoint fixed wireless, and should initiate a rulemaking to fully consider the Petitioner's proposal.

Respectfully submitted,  
Starry, Inc.



By: \_\_\_\_\_

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